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May 19, 2021

Via ECF

The Honorable Nicholas G. Garaufis
United States District Court Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: **Illuminada Ortega v. Champagne Room BK, Inc. et al.**
Civil Action No.:1:21-cv-01125-NGG-CLP

Dear Judge Garaufis:

I represent defendants Yevgeniy Trofimchuk and Draft and Grill, Inc., named defendants in this action. I was just retained today.

I write, with the consent of plaintiff's counsel Jonathan Shalom, to request an extension of time to respond to the complaint until June 15, 2021. This is defendants' first request for an extension of time to respond. This request is submitted in good faith. It will not cause undue delay because the time to respond comes before this Court's scheduled preliminary conference on June 23, 2021.

Thank you for the Court's attention to this matter.

Respectfully submitted,


Michelle Rago

cc: All counsel of record (via ECF)